



LAW OFFICES OF
CORY H. MORRIS
ATTORNEY &
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Via Electronic Case Filing Only

August 2, 2018

To: Hon. Denis R. Hurley, USDJ

United States District Court
Eastern District of New York

Re *D.W.M. et al. v. St. Mary School, et al* 2:18-cv-03099 DRH-GRB

In accordance with the July 20, 2018 Order [D.E. 55] of this Honorable Court, Plaintiffs have caused personal service of each of the following documents to be made upon all of the party defendants in this action:

- Summons [D.E. 29];
- Fourth Amended Verified Complaint [Originally filed as ECF # 27 on 7 June 2018];
- Signed Order to Show Cause dated May 29, 2018 [D.E. 7];
- Refiled Affirmation by Plaintiff Ursula Moore [D.E. 18];
- Refiled Plaintiffs' Supplemental Memorandum of Law [D.E. 19];
- Refiled Affirmation by Plaintiffs' Attorney [D.E. 20]; and
- Summons [D.E. 29] and Re-refiled Second Amended Verified Complaint [D.E. 27].

In addition, prior to such personal service upon each of the party defendant, each of the attorneys who have appeared on their behalf was served by electronic mail.

The affidavits of personal service upon each of the adult and institutional party defendant have been electronically filed with the Court and appear in the electronic case file as D.E. 57 through D.E. 64.

Enclosed hereto are the redacted affidavits of service for the infant Plaintiffs. Should it be required, Plaintiffs respectfully requests permission of this court to file the affidavits of personal service upon the infants involved in this action under seal with the Clerk of the Court and request this Honorable Court to direct the Clerk to accept and file those affidavits under seal.

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Plaintiffs respectfully request this Honorable Court to forthwith set a date and time for a full hearing on the merits of the application by the Plaintiffs for the relief set forth in the Order to Show Cause which Your Honor signed on 29 May 2018 [D.E. 7] to the extent that such relief is still appropriate, specifically, an order:

“DIRECTING Defendants to take all actions necessary to immediately remove permanently any images or content referring to Plaintiffs [D.M. or D.M.] or any member of the Moore family from any electronic or other form of media.

DIRECTING Defendants to take all actions necessary to immediately and permanently remove any images or content referring to Plaintiffs DM or DM or any member of the Moore family from any device including, but not limited to laptops, tablets, other mobile devices, and storage devices.

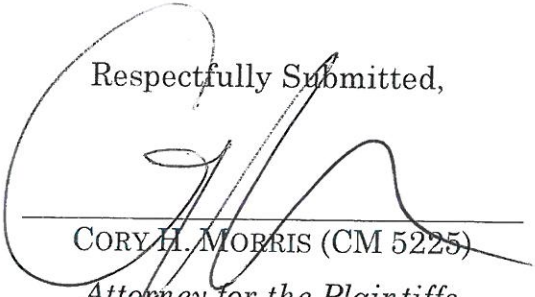
DIRECTING Defendants to take all actions necessary to immediately comply with the terms of the Litigation Hold Notice already served upon them.

DIRECTING Defendants to DELETE any and all internet or social media accounts to which the Defendants have access which have been accessed by or may be capable of being accessed by LM, MJ, and MM

DIRECTING Defendants to DELETE any and all images or content from any internet or social media sites maintained by or to which the Defendants may have access which have been accessed by or may be capable of being accessed by LM, MJ, and MM”

Plaintiffs thank the Court for its consideration of this application.

Respectfully Submitted,



CORY H. MORRIS (CM 5225)

Attorney for the Plaintiffs

Encl: